

MARK J. ROMEO SBN 112002  
LAW OFFICES OF MARK J. ROMEO  
130 Sutter Street, 7<sup>th</sup> Floor  
San Francisco, CA 94104  
Telephone: (415) 395-9315  
Facsimile: (415) 395-9318  
*romeolaw@msn.com*

Attorneys for Defendant  
INTEGRITY INVESTMENT GROUP, LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

KEVIN R. MCLEAN,

Plaintiff,

v.

WORLD SAVINGS FSB; INTEGRITY  
INVESTMENT GROUP, LLC; GOLDEN  
WEST SAVINGS ASSOCIATION  
SERVICE CO.; SUSAN FEDERIGHI; BILL  
FORD; JEFFREY FORD; CALIFORNIA  
FRANCHISE TAX BOARD; WILLIAM L.  
VEEN,

Defendants.\_\_\_\_

No. 07-05594 JSW

**NOTICE OF MOTION AND  
MOTION TO EXPUNGE NOTICE  
OF PENDING ACTION; AND FOR  
ATTORNEYS FEES**

**Date: March 7, 2008**

**Time: 9:00 a.m.**

**Courtroom: Hon. Jeffrey S. White,  
Courtroom 2, 17<sup>th</sup> Floor**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on March 7, 2008 at 9:00 a.m., before the Hon. Jeffrey S. White, United States District Court, Courtroom 2, 17<sup>th</sup> Floor, 450 Golden Gate Avenue, San Francisco, California 94102, pursuant to California Code of Civil Procedure § 405.32, Defendant Integrity Investments, LLC, specially appearing herein, will, and hereby does, move the court for an order expunging the Notice of Pending Action recorded on November 5, 2007, as Instrument

1 No. 2007-158458 in the Office of the San Mateo County Recorder against defendant's real  
2 property commonly known as 481 West Maple Way, Woodside, California 94062, and as legally  
3 described in the proposed order filed herewith.

4 NOTICE IS FURTHER GIVEN that defendant will move the court for an order under California  
5 code of Civil Procedure Section 405.38 awarding it attorneys fees for this motion in the amount  
6 of \$900.00.

7 The motion will be made on the grounds that plaintiff cannot establish the probable validity  
8 of the state law real property claim in this action.

9 The motion will be based upon this Notice; the Declaration of Mark J. Romeo, the  
10 Memorandum of Points & Authorities, filed herein and served herewith; and such other evidence  
11 and argument as may presented by the moving party at or prior to the hearing of the motion.

12 Dated: January 24, 2008

LAW OFFICES OF MARK J. ROMEO

13 By /s/Mark J. Romeo  
14 MARK J. ROMEO  
15 Attorneys for Defendant  
16 INTEGRITY Investment Group LLC  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

I am employed in the City and County of San Francisco, California. I am over the age of 18 years and not a party to the within action; my business address is 130 Sutter Street, 7<sup>th</sup> Floor, San Francisco, CA 94104.

On January 24, 2008, I served the foregoing document(s) on the interested party(ies) in this action by placing        a true copy XX the original of said document(s) in a sealed envelope(s) addressed as stated below and

**BY MAIL**

       I deposited such envelope(s) in the mail at San Francisco,

       I am "readily familiar" with the office's practice of collection and processing correspondence for mailing. Under that practice, the mail would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at San Francisco, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

**BY PERSONAL SERVICE**

       Personally hand delivered said document(s) to addressee

       I caused said document(s) to be served via personal service

**BY OVERNIGHT MESSENGER**

       I caused said document(s) to be served by for next-day delivery, by agreement with tenants

**BY FACSIMILE**

       And I faxed such document(s) to telephone number. A transaction report confirming a successful transmission was obtained.

**BY certified or registered mail**

       I deposited such envelope(s) in the mail at San Francisco, California with the U.S. postal service on that same day with postage thereon fully prepaid, certified mail, return receipt requested.

**PARTY(IES) SERVED:****Plaintiff**

KEVIN R. MCLEAN

LAW OFFICES OF BELLI & MCLEAN

473 Jackson Street, Second Floor

San Francisco, CA 94111

**Defendants World Savings, Golden West Savings Association Service Company**

JACK R. NELSON

R. EUNA KIM

REED SMITH LLP

POB 7936

San Francisco, CA 94120-7936

**Defendants Bill Ford, Jeffrey Ford, Susan Federighi**

BILL FORD

1455 Sierra Drive

Pacifica, CA 94044

**DOCUMENT(S) SERVED:****Not of Motion****Memo P&A****Proposed Order****Decl of Romeo**

       I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on January 24, 2008 at San Francisco, California.

Mark J. Romeo

Type or Print Name

/s/ Mark J. Romeo

Signature